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July 5, 2011

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Oral Ex Parte Presentation
PS Docket No. 07-114, PS Docket No. 10-255, and WC Docket No. 05-196

Dear Ms. Dortch:

On June 30, 2011, Tamara Preiss, Mark Montano, Mike Armstrong (via teleconference) and the undersigned of Verizon, and Robert Morse and Susan Sherwood of Verizon Wireless (together "Verizon"), met with staff of the Public Safety and Homeland Security Bureau ("Bureau") to discuss matters relating to the above-referenced proceedings. Deputy Bureau Chief David Furth and the following Bureau staff attended: Rizwan Chowdhry, Patrick Donovan (via teleconference), Aaron Garza, John Healy, David Siehl, and Jerry Stanshine.

The parties discussed the requirements and proposals contemplated in the Commission's forthcoming Order and Notices of Proposed Rulemaking ("NPRMs") on wireless location accuracy and reliability, as tentatively scheduled for the Commission's Open Meeting of July 12, 2011. We discussed the following issues:

- Regarding the Order on location accuracy, if the Commission adopts a mandatory testing schedule, requirements concerning test methodology, including indoor testing, should not be imposed. The Commission should instead defer such issues to stakeholders to develop appropriate best practices. Issues concerning test methodology should be resolved expeditiously, as carriers will need regulatory certainty to ensure they have adequate time to complete testing in advance of any compliance deadlines. Verizon also supports a uniform handset-based solution requirement after the 8-year benchmark period expires for both location accuracy and customer base penetration, as stated in its comments filed in this docket. *See* Comments of Verizon and Verizon Wireless in PS Docket No. 07-114 and WC Docket No. 05-196, filed Jan. 19, 2011, at 1-4.

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- Regarding the NPRMs on E911 location accuracy and reliability for VoIP technologies, Verizon explained that potential solutions for over-the-top providers are largely speculative at this time, and would require substantial standards development. Verizon also reiterated that VoIP providers rather than ISPs should bear the compliance and cost burdens of developing 911 location solutions. *See* Verizon Ex Parte Notice in PS Docket Nos. 07-114 and 10-255, and WC Docket No. 05-196, at 1-2.

Pursuant to Section 1.1206(b) of the Commission's rules, 47 C.F.R. § 1.1206(b), this letter is being filed electronically in the above-referenced proceedings. Please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink, reading "Nneka Ezenwa". The signature is fluid and cursive, with the first name "Nneka" and last name "Ezenwa" clearly distinguishable.

cc: David Furth
Rizwan Chowdhry
Patrick Donovan
Aaron Garza
John Healy
David Siehl
Jerry Stanshine